

UNITED STATES DISTRICT COURT
for the
District of Oregon

United States of America
v.

AUGUST DEAN GORDON

) **SEALED**
)
) Case No. 3:25-mj-00181

)
)
)
)

Defendant(s)

**CRIMINAL COMPLAINT
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2025 in the county of Multnomah in the
District of Oregon, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 111(a)(1)	Assaulting a federal officer, Class A Misdemeanor
18 U.S.C. § 1361	Willful depredation of government property

This criminal complaint is based on these facts:

See affidavit of FPS SA [REDACTED] attached hereto and incorporated by reference.

Continued on the attached sheet.

Via telephone

Complainant's signature

[REDACTED] *Special Agent, FPS*

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone at 8:20 a.m./~~8:20~~ m.

Date: 06/30/2025

Jolie A. Russo
Judge's signature

City and state: _____

Portland, OR

Hon. Jolie A. Russo, U.S. Magistrate Judge

Printed name and title

SEALED 3:25-mj-00181

DISTRICT OF OREGON, ss: AFFIDAVIT OF [REDACTED]

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, [REDACTED] being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Senior Special Agent with the Federal Protective Service (FPS) and have been since 2009. My current assignment is [REDACTED]

[REDACTED] I graduated from the Federal Law Enforcement Training Center's Criminal Investigator Training Program in August 2009. I have experience investigating crimes against federal employees and federal property, including threats and assaults on federal government employees, and damage to federal buildings and property.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for AUGUST DEAN GORDON for Depredation of Government Property, in violation of 18 U.S.C. § 1361, and Assault on a Federal Officer, in violation of 18 U.S.C. § 111(a)(1). As set forth below, I have probable cause to believe that GORDON committed the crimes of Depredation of Government Property, in violation of 18 U.S.C. § 1361, and Assault on a Federal Officer, in violation of 18 U.S.C. § 111(a)(1).

3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, my review of records related to this investigation, communication with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in

Affidavit of [REDACTED]

support of the application for a complaint and an arrest warrant, it does not set forth each fact that I or others have learned during this investigation.

Applicable Laws

4. 18 U.S.C. § 1361 makes it an offense to willfully injure or commit any depredation against any property of the United States, or of any department or agency thereof, or any property which has been or is being manufactured or constructed for the United States, or any department or agency thereof, or attempts to commit any of the foregoing offenses.

5. 18 U.S.C. § 111(a)(1) makes it an offense to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of official duties. Persons designated in § 1114 include any officer or employee of the United States or of any agency in any branch of the United States government while such officer or employee is engaged in or on account of the performance of official duties, and any person assisting such an officer or employee in the performance of official duties. Under § 111(a), simple assault is a misdemeanor, but where the assaultive acts involve physical contact with the victim, the offense is a felony punishable by imprisonment up to 8 years. Assaulting a federal officer which results in bodily injury is punishable by up to 20 years' imprisonment. The statute does not define "bodily injury" however 18 U.S.C. § 1365(h)(4) has been interpreted to define bodily injury to mean: (A) a cut, abrasion, or bruise, (B) physical pain, or (C) any other injury to the body, no matter how temporary.

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Statement of Probable Cause**June 2025: Protests at the Portland ICE Building**

6. Since June 4, 2025, protests have occurred at the U.S. Immigration and Customs Enforcement (ICE) Portland Field Office located at 4310 S Macadam Ave in Portland, Oregon. During daylight hours, some of the attendees at the demonstration have harassed both ICE clients and employees by following them with cameras making disparaging remarks and threatening statements, including stating that they know where the target lives or that they will find the target of the harassment. Many of these individuals dress in all black clothing, commonly referred to as “black bloc.” Black bloc can prevent identification of individual actors by authorities. After nightfall, the attendees generally become more aggressive, damaging personal and government property, and throwing items toward federal law enforcement officers working at the building. The violence toward officers has included discharging pepper spray at officers as well as throwing rocks, trash, and bricks pulled from the ICE facility’s driveway.

7. On June 29, 2025, at approximately 3:14 AM, a person could be seen pulling off the proximity card reader from a stanchion located on the ICE facility’s driveway in a sharp jerking motion. The person in the video was wearing a short sleeved black shirt, a black helmet, clear goggles, a light blue surgical mask, a black glove on their left hand, black boots, black elbow pads, and black body armor that appeared to be taped on with black duct tape. I retrieved a short video of the crime occurring and a screen shot of the person’s appearance while committing the crime appears below.



8. I showed the video and photo to officers who went out to find the subject. A short time later, I heard the team announce on the radio that they had a subject in custody who had fought them.

9. While awaiting the arrest team's return, I examined the stanchion in the driveway for damage. The stanchion houses two proximity card readers and a video call box. These electrical components were covered in paint from vandalism that had been continuously occurring since June 4, 2025. The proximity card reader typically mounted in the middle of the stanchion was missing and a broken computer ribbon cable could be seen in its place.

10. The arresting officers brought the subject into the building's detention area where I observed them take a photo of the subject and of the subject's clothing, protective equipment, and belongings. The subject was wearing a short sleeved black shirt, a black helmet, clear goggles, a light blue surgical mask, black elbow pads, and black foam which was duct taped to their torso and appeared to be the individual who had damaged the proximity card reader. Arresting officers also showed me a single black left-handed glove with reenforced knuckles they had removed from the subject. I identified the person as AUGUST DEAN GORDON by the Oregon driver's license I found in their wallet.

11. While taking GORDON into custody, five officers sustained injuries. Officer Victim 1 (OV1) was kicked in the left shin by GORDON, which resulted in swelling and redness that OV1 treated with an ice compress. GORDON kicked Officer Victim 2 (OV2) in the left forearm, which caused lingering pain until that evening. GORDON grabbed Officer Victim 3's (OV3) genitals and kicked OV3 in the back causing pain. GORDON grabbed Officer Victim 4 (OV4) in the groin and OV4 experienced pain and bleeding from GORDON kicking OV4 in the

right knee. Finally, GORDON grabbed Officer Victim 5's (OV5) genitals and OV5 had pain from GORDON kicking OV5 in the shin.

12. After another FPS Special Agent read a *Miranda* warning to GORDON, the agent and I conducted an interview of GORDON. After being shown the footage of the subject pulling the proximity card reader off the stanchion, GORDON admitted to the conduct. GORDON also admitted that during his arrest he kicked officers and head butted one. GORDON also stated that he had grabbed at whatever he could and that his head was being forced down and he could not see.

Conclusion

13. Based on the foregoing, I have probable cause to believe that AUGUST DEAN GORDON willfully committed Depredation of Government Property, in violation of 18 U.S.C. § 1361, and Assault on a Federal Officer, in violation of 18 U.S.C. § 111. I therefore request that the Court issue a criminal complaint and an arrest warrant for AUGUST DEAN GORDON.

14. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by an Assistant United States Attorney, and the AUSA advised me that the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Request for Sealing

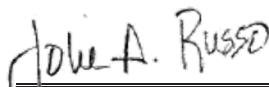
15. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested arrest warrant. I believe that sealing these documents is necessary any disclosure of the information at this time may cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise

seriously jeopardize an investigation. Premature disclosure of the affidavit and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1

[REDACTED]
Senior Special Agent, FPS

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 8:20
a.m./~~p~~m. on 06/30/2025.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge